

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

TATI ABU KING and TONI HEATH JOHNSON,

Plaintiffs,

v.

JOHN O'BANNON, in his official capacity as Chairman of the State Board of Elections for the Commonwealth of Virginia; ROSALYN R. DANCE, in her official capacity as Vice Chair of the State Board of Elections for the Commonwealth of Virginia; GEORGIA ALVIS-LONG, in her official capacity as Secretary of the State Board of Elections for the Commonwealth of Virginia; DONALD W. MERRICKS, in his official capacity as a member of the State Board of Elections for the Commonwealth of Virginia; MATTHEW WEINSTEIN, in his official capacity as a member of the State Board of Elections for the Commonwealth of Virginia; SUSAN BEALS, in her official capacity as Commissioner of the Department of Elections for the Commonwealth of Virginia; ERIC SPICER, in his official capacity as the General Registrar of Fairfax County, Virginia; and SANDY C. ELSWICK, in her official capacity as the General Registrar of Smyth County, Virginia,

Defendants.

Case No. 3:23-cv-00408

JOINT MOTION TO MODIFY INITIAL PRETRIAL ORDER

Pursuant to Federal Rule of Civil Procedure 16(b)(4), Plaintiffs and Defendants (together, the “Parties”) jointly request modification of the Court’s March 27, 2025 Initial Pretrial Order, Dkt. 126, as follows.

1. The party with the burden of proof on an issue will disclose the information required under Federal Rule of Civil Procedure 26(a)(2) by Wednesday, June 4, 2025; opposing party by Wednesday, June 18; rebuttal expert(s) by Wednesday, July 2, 2025;

2. All discovery shall be completed by Wednesday, July 9 and written discovery shall be served such that the responses are due no later than Wednesday, July 9;
3. Motions challenging the designation of experts shall be filed no later than Friday, July 18, 2025;
4. Motions for summary judgment shall be filed no later than Friday, July 18;
5. Motions regarding class certification shall be filed no later than Friday, July 18;
6. Responses to motions challenging the designation of experts, motions for summary judgment, and motions regarding class certification shall be filed no later than Friday, August 8, 2025;
7. Replies in support of challenges to the designation of experts, motions for summary judgment, and motions regarding class certification shall be filed no later than Thursday, August 21, 2025; and
8. All other pretrial deadlines shall be stayed pending resolution of any motions for summary judgment and class certification.

Dated: April 30, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on April 30, 2025, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all parties of record.

/s/ Brittany Blueitt Amadi
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